SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

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MANUEL ROEL, Individually and Derivatively as 50% Shareholder of ROEL & HSU CORP., as 25% Shareholder of CHRL REALTY CORP., as 25& Shareholder of RLCH, INC., and as 25% Shareholder of 190-15 48th AVENUE CORP.,

Index No. 709652/2017

NOTICE OF FILING OF NOTICE OF REMOVAL

Plaintiff,

-against-

JOE HSU, ESTER HSU, ROEL & HSU CORP., RLCH, INC., CHRL REALTY CORP., 190-15 48th AVENUE CORP., MOU YANG LAM, KWAN CHO CHEUNG, MING KAM CHEUNG, HEONG LENG LOU, JIM GUO LIN, KAM MING LAM, AND SIU LING WONG,

Defendants.

STEVEN CHEUNG, MING YUNG CHEUNG, GUI: ZHEN CHEN, CHEUNG CHIN CHAU, TUNG: SUET RUBY LAM AND WONG KUCK TAN,

Defendants/Intervenors.

PLEASE TAKE NOTICE that that certain claims, counterclaims, and cross-claims by or against RLCH, Inc. asserted in the above-captioned action have been removed this day to the United States Bankruptcy Court for the Eastern District of New York as set forth in the Notice of Removal (the "Notice") annexed hereto as Exhibit A. Upon the filing of the Notice, defendant RLCH, Inc. has effected removal under 28 U.S.C. § 1452.

Dated: New York, New York August 28, 2020 HERRICK, FEINSTEIN LLP

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